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*Attorneys for Defendants City of
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David G. Perry*

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TAMARA DOWNEN, Individually
and as Personal Representative for the
ESTATE OF STANLEY L.
DOWNEN,

Plaintiffs,

v.

MONTANA VETERANS' HOME;
STATE OF MONTANA
DEPARTMENT OF PUBLIC
HEALTH AND HUMAN SERVICES;
CITY OF COLUMBIA FALLS; MIKE
JOHNSON and DAVID G. PERRY,

Defendants.

Cause No. CV-13-121-M-DWM

**AFFIDAVIT OF WILLIAM L.
CROWLEY CONCERNING
MOTION *IN LIMINE* AS TO
PLAINTIFF'S EXPERTS**


STATE OF MONTANA)
 : ss.
County of Missoula)

William L. Crowley, being first duly sworn upon his oath, deposes and says
as follows:

1. William L. Crowley is one of the attorneys representing Defendants
City of Columbia Falls, Mike Johnson and David G. Perry in the above action.

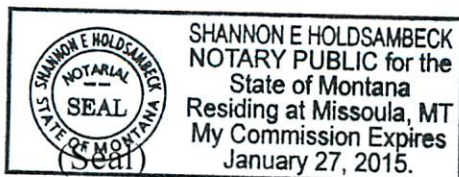
2. Attached as Exhibit A is the unsworn declaration of Mark Kroll,
Ph.D., FACC, FHRS, under 28 U.S.C. § 1746. The unsworn declaration provides
the medical and scientific bases for excluding the testimony of Dr. Walter Peschel
under *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and
Rule 702, Fed. R. Evid.

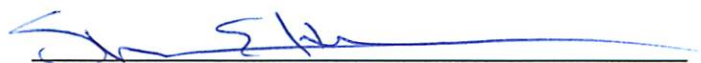
DATED this 8th day of January, 2014.



William L. Crowley
BOONE KARLBERG P.C.
*Attorneys for Defendants City of
Columbia Falls, Mike Johnson and
David G. Perry*

SUBSCRIBED AND SWORN TO before me this 8th day of January, 2014,
by William L. Crowley.





Shannon E. Holdsambeck
Notary Public for the State of Montana
Residing at: Missoula, Montana
My Commission Expires: January 27, 2015